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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Honorable Edward S. Kiel  
 :  
 : Mag. No. 20-15306  
 v. :  
 : **CRIMINAL COMPLAINT**  
 HASSAD SHANNON :  
 :

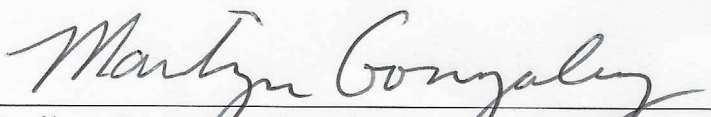
I, Marilyn Gonzalez, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Deputy U.S. Marshal with the U.S. Marshals Service and that this complaint is based on the following facts:

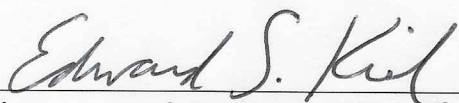
**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

  
Marilyn Gonzalez, Special Deputy U.S. Marshal  
U.S. Marshals Service

Attested to by telephone pursuant to  
Fed. R. Crim. P. 4.1(b)(2)(A) on June 19, 2020  
in the District of New Jersey

HONORABLE EDWARD S. KIEL  
United States Magistrate Judge

  
Signature of Judicial Officer

**ATTACHMENT A**

COUNT ONE

(Possession with Intent to Distribute Heroin)

On or about May 14, 2020, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

HASSAD SHANNON,

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 14, 2020, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

HASSAD SHANNON,

in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely possession with intent to distribute heroin, as set forth in Count One, did knowingly possess a firearm and ammunition, namely, a .40 caliber Springfield Armory Model XD semiautomatic handgun, bearing serial number XD423012, which was loaded with twenty-four rounds of .40 caliber ammunition.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**ATTACHMENT B**

I, Marilyn Gonzalez, am a Special Deputy U.S. Marshal with the U.S. Marshals Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On May 14, 2020 at approximately 10:30 a.m., Newark Police officers were conducting patrol in unmarked patrol vehicles in the area of the Betty Shabazz public housing complex when they observed a black Dodge Durango (the “Dodge”) exit the rear driveway of the complex. The Dodge had a heavily tinted windshield, in violation of New Jersey motor vehicle traffic laws.

2. The officers activated their lights and siren and conducted a motor vehicle stop of the Dodge. They approached the Dodge and asked Defendant HASSAD SHANNON, who was the vehicle’s driver and sole occupant, for his driving credentials. As the officers approached the Dodge, one of them smelled the odor of raw marijuana emanating from the driver’s side window that Defendant HASSAD SHANNON had rolled down. The officer then asked for Defendant HASSAD SHANNON’s driving credentials, and also asked him if he had anything illegal in the car. Defendant HASSAD SHANNON responded, “yeah, some weed and some pills.”

3. The officer then asked Defendant HASSAD SHANNON to exit the Dodge, to which he complied. One of the officers then opened the front passenger door of the Dodge and observed a .22 caliber bullet casing on the front driver’s seat. One of the other officers then opened the driver’s door and observed that the driver’s side door window switch panel was unclipped and not in place. As the officer illuminated the switch panel, he could see the butt of a handgun magazine under the panel. He then lifted the panel up and observed a handgun with an extended magazine hidden inside the door panel under the switch panel. The handgun was a .40 caliber Springfield Armory Model XD semiautomatic handgun, bearing serial number XD423012 (the “Firearm”), which was loaded with twenty-four rounds of .40 caliber ammunition (the “Ammunition”).

4. Defendant HASSAD SHANNON was then placed under arrest. A search of the Dodge revealed a prescription bottle which contained eighteen oxycodone tablets and \$164 in United States currency. A search of Defendant HASSAN SHANNON revealed a clear sandwich bag containing a small amount of marijuana.

5. Defendant HASSAD SHANNON was then transported in a police vehicle to police headquarters, where he was processed. After the processing, the officer who had conducted the transport returned to his vehicle and observed a clear sandwich

bag under the front passenger seat, directly in front of where Defendant HASSAD SHANNON had been sitting during the transport. In the bag were 78 glassine envelopes of suspected heroin. A check of the vehicle's interior video camera showed that after being placed in the vehicle for transport, Defendant HASSAD SHANNON moved around in the rear seat, appeared to remove an item from his rear pants pocket, and then appeared to kick the item under the front passenger seat where the bag of heroin was found.

6. The Firearm and Ammunition were manufactured outside the State of New Jersey. Therefore, the Firearm and Ammunition necessarily had to move in interstate commerce prior to May 14, 2020.